

REMARKS

Claims 1-14 are pending in this application. By this Amendment, claim 14 is added to recite additional features disclosed in the specification at, for example, page 4, lines 13-20 and 30-32, and page 5, lines 26-28.

Entry of the amendments is proper under 37 C.F.R. §1.116 since the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issue requiring further search and/or consideration since the amendments amplify issues previously discussed throughout prosecution; and (c) place the application in better form for appeal, should an appeal be necessary. Entry of the amendments is thus respectfully requested.

The Office Action rejects claims 1-13 under 35 U.S.C. §102(e) over U.S. Patent 6,088,037 to Fukunaga et al. This rejection is respectfully traversed.

The Office Action asserts that Fukunaga discloses all elements recited in claims 1-13. Applicant respectfully submits that Fukunaga does not disclose or suggest an image-processing apparatus, wherein each of the image processing sections are capable of being set to one of a first operation mode allowing data communication with a control section, and a second operation mode allowing only reception from the control section, as recited in claims 1-13.

As discussed in the May 28, 2004, Amendment, Fukunaga discloses a plurality of processor elements, one of which is a "master" that outputs a synchronization signal so that the "other process elements" are synchronized. See col. 14, lines 41-45. As argued in the May 28 Amendment, the only difference between the "master" and "the other processor elements," as disclosed in Fukunaga, is that the master outputs the synchronization signal. Fukunaga does not disclose any other difference between the master and the other processor elements regarding data communication with a control section.

The Office Action asserts, in response to the May 28 Amendment, that Fukunaga discloses a processor element being set as a master, thereby being set to one of a first operation both allowing data communication with a control section. Applicant respectfully submits that this assertion is improper.

Applicant respectfully submits that the master/slave relationship disclosed in Fukunaga is narrowly limited within the context of generating a synchronization signal. See col. 14, lines 38-45. Fukunaga's master/slave relationship has nothing to do with data communication with a control section. Thus, by disclosing a master/slave relationship in the narrow terms of generating a synchronization signal, Fukunaga does not automatically disclose a master/relationship in terms of communicating data with a control section.

The Office Action asserts, without citing any reference, that a master/slave relationship is a well-known model for communication protocol. Applicant respectfully requests that a reference be produced to demonstrate how an alleged "well-known" model for data communication protocol may be applied in Fukunaga's synchronization signal generation and in the current rejection, so that Applicant can recognize and seek to counter the grounds for rejection. See *Chester v. Miller*, 15 USPQ2d 1333, 1337 (Fed. Cir. 1990).

The Office Action further asserts that, in a master/slave relationship, it is inherent that the slave has reception only. Applicant respectfully submits that such an asserted "inherency" is baseless.

To establish inherency, the extrinsic evidence 'must mke clear that the missing descriptive matter is necessarily present in the thing described in the reference. . . . Inherency, however, may not be established by probabilities or possibilities. The mere fact that a certain thing may result from a given set of circumstances is not sufficient.'" *In re Robertson*, 49 USPQ2d 1949, 1950-51 (Fed. Cir. 1999). Applicant respectfully submits that, when a master/slave relationship may be defined both in terms of generating a synchronization signal

and in terms of communicating data with a control section, the master/slave relationship in terms of communicating data with the control section is one of at least two possibilities. Therefore, by disclosing a master/slave relationship (in terms of generating synchronization signal), Fukunaga does not inherently disclose "allowing data communication with a control section" or "allowing only reception from the control section."

For at least the above reasons, by an asserted disclosure of a master/slave relationship in terms of generating synchronization signals, Fukunaga does not disclose or suggest an image-processing apparatus, wherein each of the image processing sections are capable of being set to one of a first operation mode allowing data communication with a control signal, and a second operation mode allowing only reception from the control section, as recited in claims 1-13. Thus, Fukunaga does not disclose or suggest each and every element recited in claims 1-13. Accordingly, withdrawal of the rejection of claims 1-13 under 35 U.S.C. §102(e) is respectfully requested.

Claim 14 is patentable at least in view of the patentability of claim 1, from which it depends, as well as for the additional features it recites. For example, Fukunaga discloses that the synchronization signal is generated by one of the plurality of processor elements. See col. 14, lines 41-45. Fukunaga does not disclose or suggest a scan inverter that outputs synchronization signals as a basis for the same timing, as recited in claim 14.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-14 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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